



Position Statement for CITES Standing Committee (SC69)

November 2017

Why we're at the Standing Committee meeting:

The **Wildlife Conservation Society (WCS)** is a global conservation organization that takes a science-based approach to the protection of wildlife and wild places. WCS's 'on-the-ground' presence across the globe enables us to address multiple aspects of wildlife exploitation and trade, including wildlife crime, along the trade chain in source, transit and consumer countries. WCS is a strong supporter of CITES and will be represented at the sixty-ninth meeting of the CITES Standing Committee (SC69) in Geneva by international wildlife and policy experts. We look forward to meeting with Parties and other conservation partners during SC69, and to advancing the conservation of CITES-listed species. To learn more about WCS and our work, visit www.wcs.org.

In this document:

This document captures WCS's experience and our perspective on some of the documents and proposed decisions for species and issues that we work on. Items are presented in the order of the SC69 agenda.

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How to contact us:

WCS will be represented at CITES SC69 by a small delegation led by **Dr. Susan Lieberman**. Should you have any questions or concerns regarding WCS, or our position on any agenda item to be considered during SC69, please contact **Dr. Susan Lieberman** (slieberman@wcs.org) and **Alfred DeGemmis** (adegemmis@wcs.org).



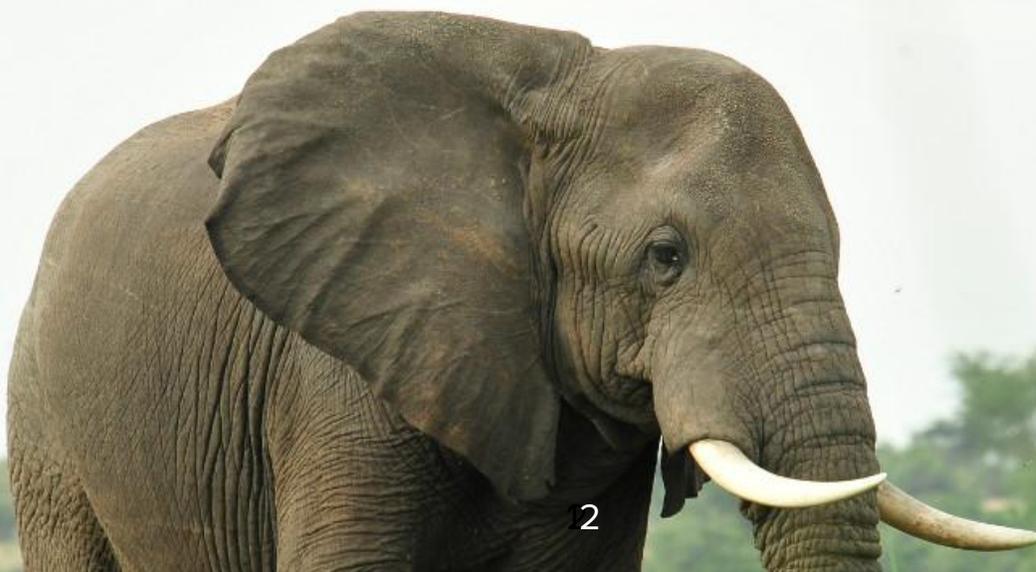
WCS at the 69th meeting of the CITES Standing Committee

The **Wildlife Conservation Society (WCS)** is a global conservation organization working to save wildlife and wild places through science, conservation action, education, and inspiring people to value nature. We envision a world in which wildlife thrives in healthy lands and seas, valued by societies that embrace and benefit from the diversity and integrity of life on earth. Our field programs in more than 60 countries in Asia, Africa, the Americas, and the Pacific build on more than 100 years of experience and scientific and technical expertise across the globe. To learn more about WCS, visit www.wcs.org.

WCS's 'on-the-ground' presence across much of the globe enables us to address wildlife exploitation and trade, including wildlife crime, along the trade chain in source, transit and consumer countries. Our field research and conservation efforts support the design and implementation of science-based conservation and management strategies that will not only conserve and protect species, but also enhance sustainability in the exploitation of species while improving benefits to local communities and economies through sustainable use regimes where relevant and appropriate.

WCS is a strong supporter of CITES, has staff who have attended all meetings of the Conference of the Parties since CoP7 in 1989, and will be represented by international wildlife and policy experts at the sixty-ninth meeting of the CITES Standing Committee in Geneva, Switzerland (SC69). Our views on the agenda items are based on the best available scientific and technical information, including information from our field and country programs around the world. We have not included recommendations for species we do not work on, or those that are found in countries where we do not work. We also are still analyzing some documents and consulting our field experts, and may have updated recommendations closer to SC69.

Decisions made by Parties to CITES over the course of the meeting will have profound implications for the future of species conservation and sustainable development. We look forward to meeting with Parties and other conservation partners during SC69, and to advancing the conservation of migratory species. Should you have any questions or concerns regarding WCS, or our position on any agenda item to be considered during SC69, please contact **Dr. Susan Lieberman**, WCS's Head of Delegation, at slieberman@wcs.org and **Alfred DeGemmis** at adegemmis@wcs.org.





Strategic Matters

10. Revision and Replacement of the CITES Strategic Vision 2008-2020 [[Document 10](#)]

WCS welcomes the efforts of the CITES Secretariat and Parties to evaluate progress on the current CITES Strategic Vision. WCS has extensive experience with wildlife trade and wildlife trafficking, CITES implementation, and many other multilateral fora, and we would be pleased to join an intersessional working group with the goal of sharing our expertise and experience as the new CITES Strategic Vision 2021-2030 is developed. WCS strongly supports the 2030 Sustainable Development Agenda, and we believe that aligning the CITES Strategic Vision will continue to streamline reporting requirements for many Parties. We strongly encourage this working group to take into account processes that are in place to develop post-2020 targets for biodiversity conservation.

11. Rules of Procedure

11.3 Code of Responsibility for NGOs Participating in CITES Meetings [[Document 11.3](#)]

WCS has significant concerns about the text of a proposed Code of Responsibility for NGOs Participating in CITES meetings, as submitted by St. Vincent and the Grenadines. One of the greatest strengths of CITES is its openness to scientific, technical, and management input from international and national non-governmental organizations (NGOs), as enshrined in Article XI paragraph 7 of the Convention. As an international NGO with official ECOSOC consultative status at the United Nations, and with staff who have attended and actively engaged with all 11 of the last CITES CoPs, we are confident that the Parties benefit greatly from the open, transparent, and collaborative engagement of NGOs across the spectrum with the work and decisions of CITES. Although we have no objection in principle to a reasonable Code of Responsibility for NGOs, the proposal from St. Vincent and the Grenadines is overly restrictive, inconsistent with the CITES Rules of Procedure, and contrary to longstanding, successful CITES practice. We would be pleased to discuss this further at SC69, but urge the Standing Committee not pursue these recommendations.

15. Demand Reduction: Report of the Secretariat [[Document 15](#)]

WCS welcomes the efforts of Parties to implement and share strategies to reduce demand for illegally traded specimens of CITES-listed species. We commend the US and the Netherlands for their support to countries in developing and implementing strategies to reduce demand for illegal wildlife products, and strongly encourage Parties to work together to share intelligence and best practices to reduce the threat posed by demand for illegal products. WCS supports a focus on evidence-based demand reduction work, and also strongly supports efforts to affect consumer behavior change through legal and regulatory reform as a short-term means of reducing the threats to species of illegal wildlife trade. Where intelligence and market research reveals that legal domestic markets provide cover for laundering of illegal wildlife products, we strongly encourage Parties to evaluate the impacts of these legal markets and to close them as a means to reduce incentives for illegal trade.



16. Livelihoods and Food Security [[Document 16](#)]

WCS appreciates the submission of this document by China and the CITES Secretariat. WCS supports the Universal Declaration of Human Rights and the Strategic Objectives of the UN Food and Agriculture Organization (FAO), and we work to enhance the livelihoods of local communities through our field programs across the globe. We agree that conservation is most successful when local communities obtain livelihood, cultural, and/or spiritual benefits from healthy wildlife populations, and we recognize that it is important to understand the value of wildlife to nutrition, income, and livelihoods. Therefore, wildlife management programs should both take into consideration whether offtake is sustainable and is based on sound scientific information, along with finding mechanisms to support communities whose food security may be affected if sustainability is not possible. We are pleased to report that we are a partner in a European Commission-funded, €45million multi-country, FAO-led partnership to help African, Caribbean, and Pacific countries shift from wild meat to alternative sources of protein. Such efforts are critical, but are generally not within the remit of CITES. We would be pleased to join an intersessional working group on the issue, if one is established. The document proposes three alternatives; WCS believes that the most expeditious option would be to amend existing Resolutions, when they are within the remit of CITES.

17. Livelihoods [[Document 17](#)] [[Report on the CITES and Livelihoods Workshop](#)]

WCS appreciates the submission of this document by China, Peru, and South Africa. WCS engages actively in work with local and indigenous communities across the globe through our field conservation programs. We were pleased to be invited to participate in the international workshop on CITES and livelihoods in Cispatá, Colombia prior to CoP17. WCS notes that it is important to understand the value of wildlife to nutrition, income, and livelihoods, however, any well managed program must also take into consideration whether current offtake is sustainable and is based on sound science. WCS supports some of the recommendations in paragraph 7 of the document, including training workshops, translation of the Handbook, and other capacity building efforts. We believe as well that Parties should be encouraged to consider local and indigenous communities and their livelihoods and socioeconomic conditions when implementing CITES, and in wildlife management in general. However, we strongly oppose including livelihood or socioeconomic considerations in the preparation or evaluation of proposals to amend the CITES Appendices. We urge the Standing Committee not to endorse this, and not to endorse amending the CITES listing criteria in Resolution Conf. 9.24 (Rev. CoP17). We believe that listing should be based on the best available scientific and trade information. We also urge the Standing Committee to reject the recommendation to include socioeconomic and livelihood issues in the Review of Significant Trade, which should remain focused on the implementation of Article IV of the Convention and the issuance of science-based non-detriment findings.





18. Community Awareness of Wildlife Trafficking: Report of the Secretariat [[Document 18](#)]

WCS appreciates this report from the Secretariat on the progress being made following on the discussions during CoP16. WCS looks forward to learning more about the Terms of Reference for this consultant, and to providing any input needed -- we have significant experience working with and alongside communities in Asia, Africa and Latin America that live near source populations of wildlife and are directly impacted by unsustainable or illegal wildlife trade. We note that it is not only these rural communities living near wild animals and plants, but also communities along the trade chain that are impacted by wildlife trafficking, through weakened rule of law, alignment with other forms of organized crime, etc. Increased awareness of the impacts of illegal trade along the trade chains is necessary to effectively dismantle the transnational networks involved in illegal trade, and thus reduce threats to rural populations living alongside wild species of plants and animals.

19. Cooperation with Other Biodiversity-Related Conventions [[Document 19](#)]

WCS appreciates this update from the CITES Secretariat on their ongoing efforts to improve coordination and cooperation between CITES and other biodiversity-related agreements. WCS greatly appreciates the openness of the Parties and CITES Secretariat in allowing access for NGOs to provide technical expertise and insight on issues related to wildlife ecology, environmental law, etc., and we encourage other members of the Biodiversity Liaison Group to pursue ongoing efforts to open their processes to wide civil society input. We believe this is a powerful way to ensure that the Conventions and other international agreements achieve their goals. WCS strongly supports the updating of the CITES Strategic Vision to reflect the targets currently established within the 2030 Agenda for Sustainable Development and the Sustainable Development Goals, and we encourage the CITES Secretariat and the Biodiversity Liaison Group to engage with multilateral decisions on the post-2020 framework for biodiversity, including the 2030 targets to be adopted at the Convention on Biological Diversity Conference of the Parties in 2020.

WCS commends the UN General Assembly for adopting two Resolutions addressing CITES and its role in managing trade in marine species ([Res. 71/123](#)), as well as the strongest Resolution ever adopted by the UNGA on illegal wildlife trade ([Res. 71/L.88](#)). WCS is pleased to have addressed the co-chairs of the Group of Friends of Permanent Missions in New York on Tackling Illicit Wildlife Trafficking, including during a side event hosted by the UK, CITES and WCS at UN Headquarters on World Wildlife Day 2017, and at a High-Level Event on Illegal Wildlife Trade hosted by Gabon, Germany and WCS in June 2017. Illegal wildlife trade has been addressed in other multilateral fora, including the 41st Session of the World Heritage Committee in Krakow, Poland, during which States Parties [acknowledged the illegal wildlife trade as a threat](#) to many of the world's natural Heritage sites. Most recently, the subject of illegal trade was discussed as a threat to many migratory species during the Convention on Migratory Species (CMS) Conference of the Parties that took place in Manila, the Philippines, in October 2017. Several decisions have been taken by the CoPs of CITES and CMS to strengthen collaboration on species that are both migratory and subject to illegal trade, including sharks and rays, African carnivores, marine turtles, and more.



Interpretation and Implementation Matters

27. National Laws for Implementation of the Convention [[Document 27](#)]

WCS appreciates the significant work that has been done by the Secretariat on the CITES National Legislation Project, including the development of the web portal, compilation of extensive legislative information, analysis of the situation in countries of concern, and the provision of legal advice and assistance. WCS works through our country programs with many of the Parties who are currently in Category 2 and 3 of the CITES National Legislation Project to strengthen their national legislation for implementation of their CITES obligations and commitments. With adequate resources and where appropriate, we stand ready to support Parties to ensure that domestic legislation meets that standards required by CITES, and to ensure that trade doesn't threaten species in the wild.

28. National Reports

28.1 Submission of National Reports [[Document 28.1](#)]

WCS notes that submission of annual reports is an obligation of all CITES Parties, pursuant to Article VIII of the Convention. The analysis of trade, and evaluation of impacts of international trade on CITES-listed species on a global scale, cannot properly be undertaken without accurate and timely annual reports. WCS encourages Parties to submit their annual reports, and supports the actions pursuant to Resolution Conf. 11.7 (Rev. CoP17) recommended by the Secretariat. Where possible, we look forward to supporting Parties in ensuring compliance with CITES requirements.

28.3 Annual Illegal Trade Reports: Report of the Secretariat [[Document 28.3](#)]

WCS welcomes the requirement in Resolution Conf. 11.17 (Rev. CoP17) that Parties submit an annual illegal trade report, which will greatly enhance Parties' understanding of the scope of wildlife trafficking and Parties' responses, and enable research and analyses on wildlife crime. WCS also appreciates the adoption by the UNGA of the Resolution "[Tackling illicit trafficking in wildlife](#)," which encourages member States to enhance their enforcement efforts, including through recording and monitoring both seizures *and* successful prosecutions, in order to more effectively counter and deter the illegal trade in wildlife.

WCS concurs in general with the recommendations of the Secretariat regarding actions of the Standing Committee on this issue. The *Guidelines* contained in Annex 1 are generally good, but we consider the Guidelines and the report itself to be overly focused on seizures. Seizures are important, but without information as to whether or not a case was investigated, the perpetrator was indicted, whether there was a court case, and what sentence if any was imposed, the information on seizures is "only half the story." We understand that information as to the disposition of a case may come later than a seizure, but we strongly urge the Standing Committee, and Parties, not to treat seizures as only one step in enforcement action. Requesting information on ongoing prosecutions as part of reporting is fully consistent with the aforementioned UNGA Resolution.



29. Compliance Matters

29.1 Compliance Report [[Document 29.1](#)]

WCS supports the use of compliance measures designed to enhance Parties' implementation of and compliance with the Convention; there is a long history of CITES Parties adopting and implementing such measures. WCS appreciates the effort here by the Secretariat to summarize all compliance measures that have been adopted by the CoP, and also appreciates the utilization of Article XIII by the Secretariat.

WCS supports the Secretariat's proposal to establish an intersessional working group to explore ways to establish a Compliance Assistance Programme (CAP) and to further improve the consistent, effective and expeditious handling of compliance matters. WCS has extensive experience working with our government partners in a large number of countries, providing assistance in compliance with CITES. We hereby offer to join such a working group, if it is established, to share our experiences, expertise, and lessons learned.

WCS appreciates the Secretariat addressing the issue of non-compliance with the CITES treaty, regarding introduction from the sea from the North Pacific population of the Sei whale (*Balaenoptera borealis*, CITES Appendix I) by Japan. WCS is very concerned that large volumes of specimens from the North Pacific population of the Sei whale have been introduced from the sea by Japan. Japan has not entered a reservation to the inclusion of this population in Appendix I, and is therefore obligated to fully comply with the Convention, including Article III. We note that in June 2017, the International Whaling Commission's Scientific Committee published its 2017 annual report, including the review of Japan's "Research Plan for New Scientific Research Program in the western North Pacific" (NEWREP-NP). The Committee endorsed the recommendations of an independent Expert Panel workshop held in Tokyo in February 2017, which had concluded that lethal sampling of Sei whales in the North Pacific is "currently unjustified, and should be halted until more research has been conducted." Japan has stated that these Appendix I specimens are taken beyond national jurisdiction for scientific purposes. However, CITES Article III paragraph 5 is clear that the Management Authority of the State of Introduction can only legally issue a certificate for introduction from the sea of an Appendix I specimen if it is not to be used for primarily commercial purposes; the purposes of killing an animal is secondary to the purpose for which it is introduced from the sea (in this case, into Japan). Resolution Conf. 5.15 (Rev. CoP15) is clear in paragraph 1c that any transaction which is not wholly 'non-commercial' will be regarded as 'commercial.' WCS believes that since Japan allows, and encourages, the sale of the meat of Sei whales that it introduces from the sea, these transactions are not wholly non-commercial, and therefore do not qualify for Appendix I certificates of introduction. WCS encourages the Standing Committee to take these matters seriously, and to encourage Japan to either halt the introduction from the sea of specimens of Sei whales from the North Pacific population, or take action to prevent commercial sales of the meat of these Appendix I whales.

Finally, WCS would be pleased to participate in an intersessional workshop on legal acquisition findings to take place in the European Union in 2018. We have extensive experience with this subject in many countries around the world, and assist several Parties with the implementation of this requirement.



29. Compliance Matters (Continued)

29.2 Application of Article XIII

WCS greatly appreciates the efforts of the Secretariat to utilize the provisions of Article XIII of the Convention. Many Parties have taken important steps to fulfill their obligations under the Convention and comply with its requirements; it vital that full attention be paid to those that are found to be seriously out of compliance, and to promote enhanced political commitment to effective implementation of the CITES treaty. WCS urges the Standing Committee to address serious issues of non-compliance, and fully implement the appropriate provisions of Resolution Conf. 14.3.

29.2.1 Application of Article XIII in Lao PDR [[Document 29.2.1](#)]

WCS appreciates that the Government of Lao PDR invited the Secretariat to undertake a mission to the country in July 2017. WCS has an active conservation program in Lao PDR and was pleased to have been able to meet with the Secretariat during its mission, and to assist it with field visits. We are working with the government and other partners in Lao PDR to promote actions to ensure compliance with CITES. We agree with the Secretariat that more needs to be done by the Government of Lao PDR to bring its legislation and management systems into compliance with CITES, prosecute violators, increase penalties, and curb the trafficking of wildlife from, into and through Lao PDR. We share the concerns of the Secretariat that the Scientific Authority of Lao PDR is unable to undertake population surveys, issue science-based non-detriment findings, develop management plans for the conservation of CITES-listed species, or otherwise either ensure the sustainability of exports of Appendix II specimens or comply with CITES Articles III or IV. We also share the concerns of the Secretariat that there is significant illegal trade in Lao PDR of elephant ivory, rhino horn, and tiger parts. WCS is committed to continuing to work with the Government of Lao PDR to address the deficiencies in its implementation of CITES, and to combat wildlife trafficking. WCS considers the recommendations of the Secretariat to be sound, but also encourages adoption of compliance measures by the Standing Committee at SC69, with further actions to be decided upon by SC70 if Lao PDR has not complied with existing recommendations.

29.2.2 Application of Article XIII in the Democratic Republic of the Congo [[Document 29.2.2](#)]

This document was posted too late for a full review, analyses, and consultation with our field programs in Central Africa. Therefore, we will discuss our views on the document and recommendations contained therein during the meeting of Standing Committee 69. However, specifically as relates to the trade in the African grey parrot (*Psittacus erithacus*), WCS urges the Standing Committee to retain its recommendation to all Parties to not accept any imports of the species from DRC. DRC and two other Parties (Saudi Arabia and the United Arab Emirates) have entered reservations to *Psittacus erithacus*, and as such are non-Parties for the species. In light of the challenges facing DRC in the issuance on non-detriment findings and the enforcement of illegal trade in the species, and in light of the serious issues raised by the Republic of the Congo in SC69 Doc. 29.4 regarding illegal trade in the species, we urge Parties (including Saudi Arabia and the United Arab Emirates) to refuse all shipments of the species originating in the DRC. We urge the Standing Committee to take all measures to ensure that DRC does not issue an “experimental quota” or otherwise export wild-caught *Psittacus erithacus*, to help enable the species across its range to recover and help stem the illegal trade in this endangered, Appendix I species.



29. Compliance Matters (Continued)

29.3 National Ivory Action Plan (NIAP) Process: Report of the Secretariat [[Document 29.3](#)]

WCS appreciates the compilation of this report by the Secretariat, and commends those Parties that have taken positive steps taken to develop and implement National Ivory Action Plans (NIAPs). WCS strongly supports the NIAP process as a very useful initiative to address the ivory issues that threaten African and Asian elephants in the wild. WCS has helped or is now helping a number of Parties develop and/or implement NIAPs - including Cambodia, Mozambique and others - and is committed to continuing to do so in the future. We congratulate Parties who have made demonstrable progress on implementing their NIAPs, including in particular the efforts of China and Hong Kong SAR to close their domestic ivory markets or to provide a legislative timeline for closure in the near future. We also commend China on not only changing its domestic policies to respond to this crisis, but also on engaging Chinese nationals in other countries to ensure that they comply with domestic and international laws on trade in elephant ivory. WCS is working with the public and private sector Chinese entities and businesses in countries such as Uganda to develop best practices to combat wildlife trafficking that will be widely applicable across the continent.

We appreciate the amendments adopted at CoP17, now in Reso. Conf. 10.10 (Rev. CoP17) and its Annexes. However, we remained concerned about some aspects of the NIAP process, including decision-making process of the Secretariat and Standing Committee regarding which Parties identified by ETIS are included in the NIAP process, and whether or not external experts have been consulted in the evaluation of progress reports. We are also concerned that some Parties either have made limited progress if any, or have not even reported as required. As we noted at SC66 and CoP17, WCS believes a better approach to assessing progress with Parties' implementation of their NIAPs would be to conduct independent assessments of progress through country visits by suitable qualified experts. WCS believes that such a process of independent assessment of progress could be facilitated by CITES retaining consultants as it did during the original NIAP development period.

WCS strongly urges Parties to continue closing any markets, legal or illegal, for elephant ivory, particularly in border regions in countries such as Lao PDR, Viet Nam and Myanmar. Recent research has documented ivory and other wildlife products online and in physical markets with little oversight in these areas, as well as the activities of criminal syndicates engaged in wildlife trafficking. We strongly urge Parties to revise their NIAPs to address the evolving threats as necessary, and for Parties who are successfully implementing their NIAPs to build on their success, even if removed from the NIAP process, by assisting other Parties to implement their own NIAP commitments.

Regarding Parties that were considered for inclusion in the NIAP process, we do not believe that the risk of the domestic markets in Japan and Singapore, and their role as transit countries, should be overlooked and we believe that they should be included in the NIAP process. Parties should not see this as negative, but rather use the process to take further needed actions to help combat ivory trafficking. Furthermore, we strongly urge that future decisions on NIAP processes are not made by postal procedure, as it provides little opportunity for technical advice from other Parties and NGOs and robust debate among Standing Committee members and other Parties to CITES.



29. Compliance Matters (Continued)

29.4 Illegal Trade in Species: Grey Parrot (*Psittacus erithacus*) [[Document 29.4](#)]

WCS greatly appreciates the submission of this document by the Republic of Congo, and the efforts of the Parties to combat the illegal hunting and trade of this species. We appreciate the clarification and recommendation of the Secretariat, as summarized in [Notification 2017/063](#), that a trade suspension for DRC that was established at SC66 is currently in place. We strongly encourage Parties to adopt the recommendations contained within this document, including that Parties not accept re-exports of specimens originating in DRC without proper documentation (including validation of any associated permits by the CITES Secretariat), that range States not propose experimental or other export quotas for wild-caught specimens of this Appendix I species, and that all breeding of this species for commercial purposes fully comply with provisions of Resolution 12.10 (Rev. CoP15).



30. Review of Significant Trade in Specimens of Appendix II Species [[Document 30](#)]

This document was not posted in time for sufficient review by WCS program staff. WCS always consults broadly with our field programs working on species or in countries noted in the Review of Significant Trade, in order to provide our informed scientific and technical input. We will consult and will be able to share our views on the document and recommendations therein during the meeting of SC69.



31. Enforcement

31.1 Enforcement Matters: Report of the Secretariat [[Document 31.1](#)]

WCS appreciates the Secretariat's summary of all the efforts undertaken by the Parties, the Secretariat, ICCWC partners, intergovernmental organizations (IGOs), and NGOs, to combat trafficking in wildlife. However, poaching and wildlife trafficking continue, linked to organized crime and fed by corruption and weak governance, and far more work still needs to be done. WCS encourages renewed and strengthened action across the entire illegal wildlife trafficking chain, including protection, monitoring, science, and management on the ground to stop poaching; engagement with local communities; scaled up anti-trafficking, prosecutorial and anti-corruption efforts; and enhanced, science-based and sophisticated efforts to change consumer behavior.

We note that corruption at all levels facilitates wildlife crime, and undermines the rule of law, good governance, and sustainable development. We welcome this needed attention to the scourge of corruption, and the willingness of Parties to take action to address and counter it. We welcome the news that UNODC will take the lead on developing anti-corruption guidelines under ICCWC, and we encourage their presentation at future CITES meetings to ensure maximum transparency. We support the integration by States of their obligations under CITES with their obligations under both the UN Convention Against Corruption (UNCAC) and the UN Convention Against Transnational Organized Crime (UNTOC), and urge the 15 CITES Parties that are not Parties to UNCAC to consider ratifying that treaty.

WCS also supports recent reports on links between wildlife trafficking and money laundering or other financial crimes. We strongly support the recommendations of the UNODC and Asia/Pacific Group on Money Laundering (APG) research report, and encourage Parties to "follow the money" in wildlife crime investigations. We support the implementation of recommendations included in this report, such as enacting national legislation that treats wildlife crime as serious and organized according to UNTOC, ensuring that financial and other penalties are sufficient and comparable to other forms of transnational crime, conducting parallel financial investigations alongside wildlife trafficking investigations, ensuring that domestic legislation and procedures allow the use of alternative offences to pursue wildlife crimes, and enabling wildlife crime to be considered a predicate offence for money laundering so that anti-money laundering tools can be used.

31.2 International Consortium on Combatting Wildlife Crime: Report of the Secretariat [[Document 31.2](#)]

WCS appreciates the submission of this document, and the efforts of all ICCWC Partners and the Parties whose active participation and/or generous contributions have enabled work thus far. We recognize the value of the ICCWC Analytic Toolkit, and we are pleased to see that further contributions will allow for implementation of recommendations for countries that have been able to use the Toolkit thus far, as well as other aspects of the ICCWC Strategic Programme. We are also pleased that the ICCWC *Wildlife crime and anti-money-laundering (AML)* training program, which will help Parties address some of the concerns related to money laundering and other financial crimes associated with wildlife trafficking, has been piloted in Kenya and will be in Tanzania shortly. We strongly encourage Parties that have identified risks to participate in this program to ensure stronger alignment between financial and wildlife crime enforcement efforts.



31. Enforcement (Continued)

31.3 Combatting Wildlife Cybercrime: Report of the Secretariat [[Document 31.3](#)]

WCS appreciates the ongoing effort to build a wildlife cybercrime web page on the CITES website. WCS has experience in monitoring online sales of wildlife products in key markets, as well as translating this intelligence into arrests and prosecutions that can contribute to the dismantling of wildlife crime networks. We would be pleased to join an intersessional working group to discuss these issues in greater detail. WCS is aware of ongoing efforts to buy and/or sell illegal wildlife products on major social media sites such as Facebook and WeChat, as well as other online platforms. It is over these public sites, rather than the Darknet, that most sales of illegally traded wildlife occur. We concur with the finding of the Secretariat that Parties must continue to engage with social media platforms, to tackle illegal wildlife trade on the Internet, and to address any illegal trade through these platforms. However, we also encourage Parties to act on their own to conduct intelligence gathering and criminal investigations to ensure that those trading in these products are prosecuted where they have violated domestic law.

32. Implementation of the Convention Relating to Captive-bred and Ranched Specimens: Report of the Secretariat [[Document 32](#)]

WCS appreciates the submission of this document by the CITES Secretariat. We were pleased to be a member of previous working groups on this issue, and we consider the fraudulent issuance of permits for specimens as captive-bred that are actually wild-caught to be a significant enforcement and compliance issue, with impacts on wild populations of many species. This practice both undermines the effectiveness of the Convention, and undermines the efforts of those Parties that are working to ensure that any exports of specimens of CITES-listed species are both sustainable and legal. The subject matter and structure of the draft desk study presented in this document are thorough. WCS recommends that this study emphasize the highly detrimental impact on wild populations that fraudulent use of source codes C and D presents, and that any proposals to improve systems to minimize such fraud be clear and easily applied.

33. Asian Big Cats in Captivity [[Document 33](#)]

WCS is pleased to have been able to provide its scientific and technical input on this issue in the past through working groups under the CITES Standing Committee. There is an urgent need to quantify the conservation risks posed by commercial captive breeding facilities of Asian big cats, particularly tigers. It is vital to strengthen enforcement efforts to combat trafficking in parts and products of Asian big cats, including preventing specimens from captive-breeding facilities from entering illegal trade. WCS encourages the CITES Secretariat and relevant Parties to ensure compliance with the provisions of Decision 14.69. We strongly encourage the Secretariat to undertake monitoring missions to Parties in whose territory there are intensive operations breeding tigers on a commercial scale (per Decision 14.69 and Decision 17.229). We also urge the Standing Committee to direct the Secretariat to issue a Notification to obtain information on which countries have such facilities, in order to assist Parties with implementation of relevant decisions and resolutions of the CoP, and to benefit conservation of Asian big cats in the wild.



34. Disposal of Confiscated Specimens [[Report of the Secretariat](#)] [[Report of the Co-Leads](#)]

WCS appreciates the efforts of Israel and Switzerland to develop a survey for Parties on their procedures for disposal of confiscated specimens. This is an important issue -- as disposal of illegal products must be secure enough to not result in any further illegal trade. WCS believes that zoological parks and botanical gardens can serve as good repositories of illegally traded specimens, but we strongly encourage Parties to ensure that these facilities are accredited and uphold strict standards of care and trade controls. We also strongly encourage all Parties to document the destination of seized specimens to ensure that they do not end up back in trade circulation. WCS would be pleased to join an intersessional working group to discuss this matter further.

35. Specimens Produced from Synthetic or Cultured DNA [[Document 35](#)]

WCS appreciates this report and the extra-budgetary contribution provided by the US to advance this work. WCS is concerned about the potential impact of products derived from synthetic or cultured DNA on domestic and international markets for wildlife products, including high-value products such as elephant ivory or rhino horn, particularly with uncertain legal frameworks. Regarding the draft Terms of Reference for a consultant, WCS notes that the elements to be considered from an enforcement perspective should include measures that should be in place to ensure that specimens in trade derived using synthetic biology techniques but which might be genetically identical to and indistinguishable from wild-sourced specimens do not undermine measures to conserve the wild species concerned. WCS believes that the Terms of Reference should also include consideration of live animals potentially produced by synthetic biology techniques, so called “de-extinct” or “proxy” species, taking into account IUCN SSC (2016) Guiding Principles on Creating Proxies of Extinct Species for Conservation Benefit. WCS would be pleased to join an intersessional working group to review the findings of the consultant, and looks forward to providing our expertise on this subject. We also look forward to further discussion of this topic at the 30th meeting of the Animals Committee and the 70th meeting of the Standing Committee in 2018.

39. Definition of the Term “Appropriate and Acceptable Destinations”: Report of the Secretariat [[Document 39](#)]

WCS is a member of the intersessional working group on the definition of "appropriate and acceptable destinations" established by the Animals Committee, and we look forward to providing our expertise on this issue. We would also be pleased to join an intersessional working group under the Standing Committee, if one is established. We note that accredited zoos and aquaria provide strong and consistent support to *in situ* conservation programs around the world, for species such as elephants, tortoises and freshwater turtles, and African grey parrots. In 2015, AZA zoos and aquaria provided more than \$186 million for wildlife conservation programs around the globe including anti-poaching efforts, fighting illegal trade and reducing human-wildlife conflict, and WCS is a major contributor to these efforts.



43. Stocks and Stockpiles of Specimens of CITES-listed Species [[Document 43](#)]

WCS appreciates the document submitted by the Representative of Europe (Israel), to assist with the implementation of Decision 17.170. WCS would be pleased to join an intersessional working group on this issue, if the Standing Committee establishes one. We note that the draft Terms of Reference in Doc. 43 may be too broad; stockpile management issues and best practices for one commodity or taxon (e.g., ivory or rhino horn) may not necessarily be generalizable to other commodities/taxa. We recommend that nothing in the work of this working group and recommendations that it generates should preclude further action pursuant to Resolution Conf. 10.10 (Ref. CoP17), or discussions at the Standing Committee regarding ivory stockpiles (SC69 Doc. 51.3).

44. Identification of Specimens in Trade

44.1 Tiger Skins: Report of the Secretariat [[Document 44.1](#)]

WCS strongly believes that enhanced collection and sharing of visual identification assets for tigers (and other species) can complement both trade control and field research. We have worked closely with government partners in the past and agree that there are few national level databases. We recommend that the Secretariat be directed to broaden the initiative and pull in alternative databases from academia, NGOs and the private sector to determine what exists and assess whether contracting a consultant makes sense. We note that it may make sense to wait for forthcoming technological advances before re-engaging Parties on this issue.





Species-Specific Matters

45. Cheetahs (*Acinonyx jubatus*): Report of the Secretariat [[Document 45](#)]

WCS appreciates the submission of this document by the CITES Secretariat and commends their efforts to develop a web page for cheetahs on the CITES website. WCS, through our Range Wide Conservation Program with ZSL, supports Parties and other conservation partners in efforts to conserve cheetahs, including through the prevention of illegal cheetah trade and assistance in identifying resources to implement Decisions adopted by CoP17, and in fostering consensus-based processes of agreement with full engagement of key stakeholders. We have served on past intersessional working groups on cheetahs, and would be pleased to join a new intersessional working group as proposed by the Secretariat.

WCS strongly supports the efforts of the joint CITES-CMS African Carnivores Initiative to collaborate on implementation of decisions taken by CITES and CMS on cheetahs, lions, leopards and wild dogs. We believe that concerted actions on these species will improve our ability to conserve these species in the wild and we strongly encourage additional support for this Initiative. In light of efforts to enhance synergies between CITES and CMS, we encourage greater collaboration between range States and the two Conventions. We strongly encourage analyses of linear barriers to migratory species in Africa (including linear infrastructure developments and large scale private and public fencing initiatives) in order to develop policy guidance for African countries, building on the experience and lessons learned through CMS in the implementation of guidelines on linear infrastructure for Central Asia.

47. Eels (*Anguilla* spp.) [[Report of the Secretariat](#)] [[Report: Illegal Trade in *Anguilla anguilla*](#)]

WCS appreciates the interest of the Parties, and the Standing Committee, in the conservation of eels (*Anguilla* spp.). Harvest of eel species for trade and domestic use, combined with a number of other threats such as barriers to migration, habitat loss, turbine mortality, pollution, disease and parasites, and predators have reduced some *Anguilla* species populations to levels requiring trade controls in order to avoid utilization incompatible with their survival. However, with only one species in the genus included in the CITES Appendices (*Anguilla anguilla* following CoP14), conservation and management concerns exist, along with increasing illegal trade. We appreciate Document 47.2, submitted by the EU, which highlights the increasing trafficking in glass eels of *A. anguilla*, including serious increases in the involvement of organized criminal networks. We note the evidence that trade pressures (legal and illegal) have increased on other eel species since the European Union (EU) decided not to allow exports of *A. anguilla* (due to the conservation status of the species). Declines are known from other *Anguilla* species as well.

WCS was involved in the COSEWIC ([Committee on the Status of Endangered Wildlife in Canada](#)) assessment of American eel in Canada, which recommended threatened status. We have an active field program in the U.S. on the American eel, and are a member of the Animals Committee intersessional working group that will analyze available information on the conservation and management of all species of Anguillid eels, and make recommendations accordingly. WCS strongly action by Parties to implement Decisions 17.186-17.189, including efforts to: gather information and data on population abundance, exploitation, and trade; facilitate the legal and sustainable management of the trade in all Anguillid species; and combat trafficking in specimens of all *Anguilla* species.



49. Malagasy Ebonies, Palisanders and Rosewoods

These documents were not posted in time for a full review, analysis, and consultation with our field programs. Therefore, we will discuss our views on the document and recommendations contained therein during the meeting of Standing Committee 69.

50. Sharks and Rays: Report of the Secretariat [[Document 50](#)]

WCS appreciates the ongoing attention of the Standing Committee to the implementation of the CITES listings of sharks and rays, and the activities reported in Document 50. We also greatly appreciate the significant progress made by the Secretariat, Parties, IGOs, and NGOs, in providing guidelines and capacity building to help ensure that CITES is effectively implemented for those sharks and rays on the CITES Appendices. We recommend that Parties include sharks and rays as a priority for various other implementation issues being discussed at SC66 (traceability, Customs codes, etc.). We encourage the UN Food and Agriculture Organization (FAO) to prioritize assistance to Parties, including through the CITES legislation project. Finally, we congratulate many of the Parties, FAO, and the Secretariat for the tremendous work they have done thus far to implement the new CITES shark and ray listings adopted at CoP16; we encourage further collaborative efforts, including work to close legislative gaps for these species, and efforts to link CITES implementation with fisheries conservation and management measures. WCS would be pleased to join an intersessional working group on this subject.



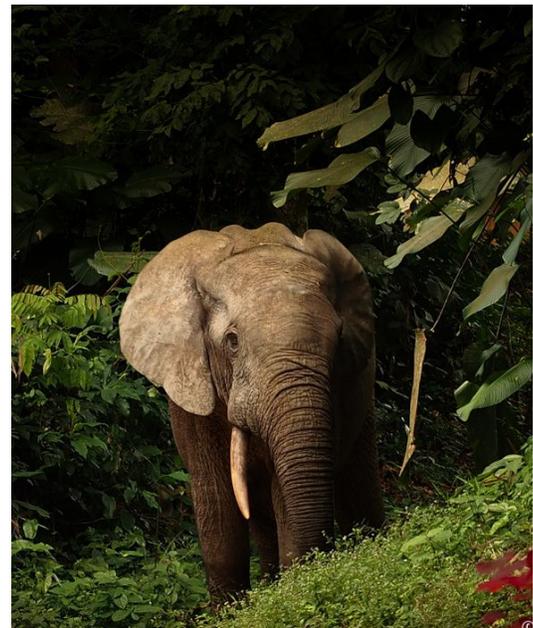


51. Elephants (*Elephantidae* spp.)

51.1 Elephant Conservation, Illegal Killing and Ivory Trade [[Document 51.1](#)] [[Annex](#)]

WCS welcomes both documents and agrees strongly with the conclusion that African elephants remain in crisis and that the analyses presented “should be a warning that more needs to be done to curtail ivory trafficking and illegal ivory markets.” While the high levels of elephant poaching and illegal trade in ivory continue to receive significant global attention and funding, there is nevertheless a pressing need for this collective effort to be maintained and – critically – for a more coordinated and effective effort throughout the trade chain. It is also clear that more attention needs to be paid to Asian elephants. WCS urges the adoption by the Standing Committee of the recommendations contained in the documents. Specifically, given the dire situation for elephants reported in SC69 Doc 53.1 and its annex, WCS calls on the Standing Committee to ensure there is meaningful, tangible progress with the CITES National Ivory Action Plan process, especially on multilateral enforcement cooperation in order to disrupt, degrade, and dismantle the organized criminal networks responsible for much of the illegal ivory trade and, at the national level, efforts to combat illegal ivory processing operations. WCS also supports the calls for regular and timely reporting of ivory seizure data to ETIS, elephant poaching rate data to MIKE, and stockpile inventory data to the Secretariat, and furthermore believes that repeated failure to report should be seen as a compliance matter. WCS also supports the proposal to disseminate the stockpile management system of the NGO ‘Stop Ivory’ to the Parties and make it available on the CITES website.

We note that it is indeed positive that the data presented show that poaching is dropping in East Africa, with several countries now more vigilant and imposing stiffer penalties. However, this has resulted in criminal trafficking networks now turning to Mozambique, where there has been an increase in ivory trafficked through its ports from elephants poached elsewhere and ongoing theft from stockpiles, and Central Africa, where elephants are continuing to be slaughtered at unsustainable levels and where ivory trafficking continues. WCS urges the Standing Committee, and all Parties, to not let down their guard, and to continue with unrelenting pressure to protect vulnerable populations of elephants, close ivory markets, and disrupt the criminal networks across the trade chain.





51. Elephants (*Elephantidae* spp.) (Continued)

51.2 Implementing Aspects of Resolution Conf. 10.10 (Rev. CoP17) on the Closure of Domestic Ivory Markets [[Document 51.2](#)]

WCS greatly appreciates this document, submitted by Burkina Faso, the Republic of Congo, Kenya, and Niger, calling the attention to implementation of aspects of Resolution Conf. 10.10 (Rev. CoP17) related to the closure of domestic ivory markets. WCS works on elephant conservation in 15 countries in Africa, working closely with governments and other stakeholders. Closure of domestic ivory markets in consumer countries is a vital enforcement tool to end the laundering of illegal ivory through legal markets. WCS congratulates those Parties that have taken active, positive steps since CoP17 to close or further close their domestic ivory markets, including in particular China (including Hong Kong SAR), the UK, France, and the US, as well as those such as the EU that are currently consulting with stakeholders and the public on the issue. We share the concerns raised in Doc. 51.2 that some Parties with domestic ivory markets, all of which contribute to illegal trade, have not taken steps to close their markets. We strongly agree with Burkina Faso, Congo, Kenya, and Niger that the Secretariat should have issued a Notification to the Parties, as a matter of urgency, inviting input from Parties on their actions regarding their domestic ivory markets, to enable the Standing Committee to have a fully informed discussion. This omission was unfortunate, and we urge the Standing Committee to direct the Secretariat to issue such a Notification as a priority after SC69. We also concur with the proponents of this document that the Standing Committee should have included Japan in the list of Parties requested to submit a National Ivory Action Plan, in light of the ETIS results and the presence of a large domestic ivory market in the country. We strongly urge the Standing Committee to adopt all of the Recommendations in this document.

51.3 Implementing the CoP17 Decisions on Ivory Stocks and Stockpiles [[Document 51.3](#)]

WCS greatly appreciates this document, submitted by Burkina Faso, the Republic of Congo, Kenya, and Niger, which recommends steps to help facilitate the implementation of Decisions 17.171-172 regarding ivory stockpiles and in particular the preparation of practical CITES guidance for the management of stockpiles, including their disposal. WCS supports putting stockpiles of seized ivory beyond economic use. We commend, therefore, those Parties that have carried out inventories and destroyed their stockpiles of seized ivory. We encourage others to do the same, noting that doing so is fully consistent with all relevant CITES requirements. However, we note that some stockpile destructions have been conducted without an inventory also being conducted, which raises concerns about seized ivory re-entering the illegal trade chain. We therefore call on all Parties planning to destroy their ivory stocks to conduct independently audited inventories before any destruction events and to make samples of the seized ivory available for DNA and/or isotope-based analysis; we recognize that the availability of CITES guidance on best practices for the management of stockpiles, including their disposal, would facilitate such inventories. We note that the guidance for the management of stockpiles, as discussed in the document, is not meant to be prescriptive to any Party, but rather to highlight options and best practice (whether a Party wishes to destroy stockpiles of seized or confiscated ivory, or it wishes to store and guard such stockpiles in a highly secure facility). We urge the Standing Committee to adopt the recommendations in the document, and to instruct the Secretariat, as it works to implement Decision 17.171, to fully take into account and make use of available existing material and technical expertise.



51. Elephants (*Elephantidae* spp.) (Continued)

51.4 Update on the Elephant Protection Initiative (EPI) [[Document 51.4](#)]

WCS greatly appreciates the submission of this document by Ethiopia, as Chair of the government-led Elephant Protection Initiative (EPI). We are pleased to note that several more African range States have joined the EPI since CoP17; membership, at the Head-of-State level, now includes Angola, Botswana, Chad, the Republic of Congo, Ethiopia, Gambia, Gabon, Kenya, Liberia, Malawi, Sierra Leone, Somalia, South Sudan, Uganda, and Tanzania, as well as the United Kingdom. All EPI signatory States except for Gambia and the UK are African elephant range States. WCS strongly supports the work and objectives of the EPI, and commends the countries that have joined the EPI as well as those donors that have supported it; we are pleased to note that WCS is one of more than 20 major NGOs that have agreed to support the work of the EPI. We encourage other African elephant range States to join the EPI, and for all Parties, IGOs, and NGOs to support the EPI by providing practical and financial support, particularly for the effective implementation of the African Elephant Action Plan. WCS operates field programs, in cooperation with government partners, for the conservation of elephants and other species, and their habitats, in many of the EPI signatory States. We congratulate the EPI States for the significant progress made on multiple issues that relate to combating the poaching of elephants for the ivory trade. We urge the Standing Committee to endorse the recommendations in the document.

54. Asian Big Cats [[Document 54](#)]

WCS is a global leader in big cat conservation, combining expertise in ecology, protected area management, law enforcement, monitoring, health, and community engagement. WCS, with our partners, is actively protecting eight imperiled big cat species on the ground within our multiple field sites around the world, with a particular focus on the Asian big cats -- tigers, leopards and snow leopards. We are also a leading authority in carnivore health and captive breeding. WCS notes that the theme for the next World Wildlife Day (3rd March 2018) is “protecting big cats,” and looks forward to working with our conservation partners, including many Parties to CITES and the Secretariat, to enhance public awareness of ongoing and future efforts to conserve Asian big cats, including the threats posed by illegal trade.

57. Pangolins [[Document 57](#)] [[Annexes](#)]

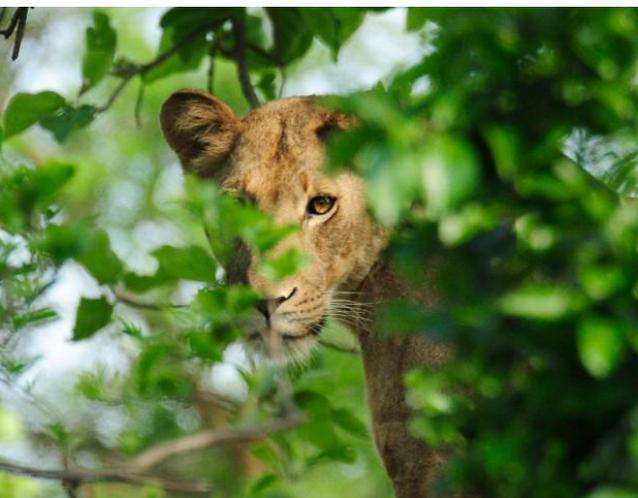
These documents were posted too late for a full review, analysis, and consultation with our field programs. Therefore, we will discuss our views on the document and recommendations contained therein during the meeting of Standing Committee 69. WCS urges Parties to be vigilant in their enforcement efforts regarding pangolins, as illegal trade in these Appendix I species is continuing. In general, we support the recommendations in Document 57, but will have further input during SC69.



58. African Lion (*Panthera leo*) [[Document 58](#)]

WCS congratulates the Parties who participated in or otherwise supported the meeting of African lion range states held in Entebbe, Uganda in May 2016. WCS works in the wild and with government partners on the conservation of lions and their habitats in at least seven countries across Africa, including Cameroon (Bouba Njida), the Democratic Republic of the Congo (Kabobo-Luama and Virunga-Hoyo), Nigeria (Yankari Game Reserve), Mozambique (Niassa National Reserve), Tanzania (Ruaha-Katavi, Tarangire National Park), Uganda (Murchison Falls National Park, Queen Elizabeth National Park, Kidepo Valley National Park), and South Sudan (Bandingalo, Boma and Southern National Parks, Sudd). WCS is concerned about the threats to African lions, including habitat loss and degradation, reduction of wild prey, human-wildlife conflict, illegal killing, unsustainable or unregulated hunting, and disease. More effort is needed to support a broader land use and management framework that addresses threats both within and outside protected areas. More research is also needed to inform the conservation of lions across their range, along with further transboundary cooperation and prioritization. A priority for intersessional CITES work should be examining the potential impact of sales of large numbers of lion skeletons on wild populations of both lions and other cats where there is trade in bones (i.e. tigers).

We strongly support the establishment of either a Task Force or an intersessional working group on African lions under the Standing Committee. While we understand that there are differences between the two, the most important step is greater collaboration on the research and management of this species in the wild and in trade. Collaborative implementation of Decisions taken at CoP17 will contribute to this effort. We commend the European Union for providing generous extrabudgetary resources for implementation of existing Decisions on African lions; however, we note that the current level of funding is insufficient for the implementation of all Decisions directed at Parties to CITES and CMS. We welcome discussion on the nature and structure of funding, and we stress that increased domestic and international contributions to the conservation of lions will be essential to protect them from increasing threats from land-use change, human-lion conflict and unsustainable or illegal trade. As such, we strongly support the African Carnivores Initiative and other means of collaboration between CMS and CITES to ensure the most efficient use of funding for shared activities. We would be pleased to join an intersessional working group or Task Force under CITES to continue looking at trade and conservation of the African lion.





59. Illegal Trade in Tibetan Antelope (*Pantholops hodgsonii*) [[Document 59](#)]

WCS appreciates the continuing efforts of the Parties and the Secretariat on the conservation of the Tibetan antelope (chiru) (*Pantholops hodgsonii*). This is a good example of how range and consumer/demand States can work together to reduce the threat of illegal trade to an endangered species. WCS is pleased to have an [active conservation program in the Changtang region of the Tibetan Plateau](#), China, where we have engaged with government partners in the conservation of the [Tibetan antelope](#) and other species, and with local communities in landscape conservation since the 1980s. There have been significant conservation successes for the Tibetan antelope, largely due to successful efforts to stem poaching and trafficking (for shahtoosh shawls). We are concerned with reports of increasing illegal trade into Europe, and we urge European countries to continue to assess the potential for illegal trade into their countries, and take the necessary actions against the perpetrators of that trade. We would be pleased to join the in-session working group recommended by the Secretariat, if one is established.

60. Rhinoceroses (*Rhinocerotidae* spp.)

When this document was finalized, Document 60 had not yet been posted. WCS always consults broadly with our field programs working on species or in countries noted in documents, in order to provide our informed scientific and technical input. As soon as the document is posted, we will consult and will be able to share our views on the document and recommendations therein during the meeting of SC69.

61. Illegal Trade in the Helmeted Hornbill (*Rhinoplax vigil*) [[Document 61](#)]

WCS appreciates the summary by the Secretariat of actions reported to date by present and former range States of the helmeted hornbill, and we greatly appreciate the actions by these Parties. We also greatly appreciate the submission of Information [Document SC69 Inf. 4](#) by the Government of Malaysia. Malaysia kindly hosted a meeting to develop the Conservation Strategy and Action Plan for the Helmeted Hornbill Working Group in May 2017 in Kuching, Malaysia. WCS was pleased to have attended and helped organize that important meeting. We urge Standing Committee members to address and adopt relevant recommendations of the Helmeted Hornbill Working Group. In particular, we urge the Standing Committee to go beyond the Secretariat's recommendation to "note" its document, to convene a working group during the meeting of the Standing Committee, and to adopt relevant recommendations of the Helmeted Hornbill Working Group, as per the Information Document. We also urge the Standing Committee to support the recommendation of the Government of Malaysia and attendees at the May 2017 meeting to establish an intersessional working group of the Standing Committee on the helmeted hornbill, to report to SC70 and subsequent meetings. Finally, we note that in its document (para. 3), the Secretariat expresses concern that as of September 2017, no transit or consumer country of specimens of helmeted hornbill had provided information to the Secretariat concerning their implementation of Resolution Conf. 17.11, as directed in Decision 17.264. We believe that had the Secretariat issued a Notification inviting such information, responses would have been received. Although a broader issue, perhaps the Standing Committee would consider directing the Secretariat to always issue Notifications to Parties when resolutions or decisions request reports or input to the Standing Committee.



64. Tortoises and Freshwater Turtles [[Document 64](#)]

WCS welcomes this document and congratulates the Government of Singapore (Agri-Food and Veterinary Authority of Singapore and Wildlife Reserves Singapore) for hosting the CITES Tortoise and Freshwater Turtles Task Force meeting in Singapore in April 2017, in close cooperation with the CITES Secretariat and other ICCWC Partners, and with the generous support of the U.S. Government. WCS is very pleased to have been able to attend the Task Force meeting, which was attended by representatives from 15 countries impacted by illegal trade in tortoises and freshwater turtles (Bangladesh, China, Colombia, India, Indonesia, Madagascar, Malaysia, Myanmar, Pakistan, Philippines, Singapore, Sri Lanka, Thailand, the U.S. and Viet Nam), as well as IGOs and NGOs.

We look forward to continuing to collaborate with Parties, the Secretariat, and others, on the conservation of these species and on enforcement efforts to stop illegal trade, and also look forward to collaborating with the Task Force. There is growing evidence of the involvement of well organized criminal networks in turtle and tortoise trafficking, including of collectors, traders, exporters and importers, particularly in Appendix I species, and we urge the Parties to implement strong measures to deter and disrupt these networks. WCS has a global program for the conservation of tortoises and freshwater turtles, and our programs in Africa, Asia, Latin America, and North America have all seen significant increases in trafficking in tortoises and freshwater turtles, particularly for the pet trade and collectors' markets. As was discussed at CoP17, WCS is particularly concerned about ongoing and rampant illegal trade in *Astrochelys yniphora* in Madagascar (CITES Appendix I and IUCN Critically Endangered) which is threatening the extinction of this species in the wild in the near future and urges Madagascar, Parties and the Secretariat to take urgent action in relation to the trafficking in this species.

WCS urges the Standing Committee to support all of the recommendations of the Task Force, as in paragraph 6 of this document, to discuss the amendments proposed by the Secretariat in paragraph 7, and to agree to propose amendments to Resolution Conf. 11.9 (Rev. CoP13) on Conservation of and trade in tortoises and freshwater turtles, based on the recommendations of the Task Force.

66. CITES Appendix III [[Document 66](#)]

WCS appreciates this document from New Zealand, as an effort to move forward on relevant Decisions from CoP17, and to help clarify for Parties aspects of inclusion of species on Appendix III, as well as its implementation. It has become clear that many Parties are confused about how to utilize, implement, and enforce Appendix III. WCS would be pleased to join an intersessional working group on the issue, if one is established.





Maintenance of the Appendices

67. Procedure for Entering Reservations with respect to the Amendments to Appendices I and II [[Document 67](#)]

WCS agrees with the Secretariat's views in this document. The CITES treaty is clear in Article XV, para. 3 that reservations to any amendment to the CITES Appendices must be submitted to the Depositary Government within 90 days of the close of the CoP where the amendment was adopted. We strongly agree with the Secretariat that "there is no basis to depart from these provisions and that accepting late reservations would undermine the integrity of the Convention and its functioning." Although WCS believes that reservations undermine the effectiveness of the Convention, we recognize the right of Parties to enter reservations. We urge the Standing Committee to be clear on this issue: the deadline in the treaty is firm, and there should be no exceptions. We support the recommendation that Reso. Conf. 4.25 (Rev. CoP14) on Reservations be amended to clarify this matter.

70. Review of Resolution Conf. 10.9 on Consideration of Proposals for the Transfer of African Elephant Populations from Appendix I to Appendix II [[Document 70](#)]

WCS recognizes that Decision 16.160 (Rev. CoP17) directs the Standing Committee to establish a working group to review Resolution Conf. 10.9 as appropriate, and to potentially consider the scope of the Resolution and its relationship with the CITES listing criteria. We note however that the Standing Committee did not deem it necessary to set up a working group on this issue between CoP16 and CoP17. African elephants are the only species with a "special" process such as this. The Panel of Experts process is distinctive to the unique situation facing elephants of split listing, which is discouraged in Resolution Conf. 9.24 (Rev. CoP17) Annex 3. The Panel of Experts is an important safeguard for African elephants, although the focus of attention and resources on potential downlisting proposals (which would be dangerous for elephants) could detract from needed attention on closure of domestic ivory markets, trade controls, and enforcement. WCS offers to join a working group if one is established.

71. Listing of Marine Species

71.1 Cooperation under the FAO-CITES 2006 MoU, with Special Reference to the Scientific and Technical Evaluation of Commercially Exploited Aquatic Species Listing Proposals [[Document 71.1](#)]

WCS agrees with Japan that it is important for Parties to have the best available scientific and technical information on which to base their decisions regarding proposals to amend the Appendices for commercially exploited aquatic species. In many cases, the analyses of proposals by the FAO Panel of Experts have been useful and informative. However, WCS sees no need for the Standing Committee, which already has a full agenda, to commence a process to draft new decisions to be submitted to CoP18 regarding further collaboration between the CITES Secretariat and FAO, regarding amendment proposals for commercially exploited aquatic species. There have been extensive discussions on the interpretation of the listing criteria in Resolution Conf. 9.24 (Rev. CoP17) for commercially exploited marine species; as it stands, the CITES Parties are sufficiently able to consult broadly with FAO and others to make decisions.



71. Listing of Marine Species (Continued)

71.2 Analysis of the Relevance of the Advice Provided by the FAO Panel of Experts for Proposals on Marine Fish Species and Evaluation of the Conservation Benefits of Marine Fish Species Listed at CITES CoP16 and CoP17 [[Document 71.2](#)]

WCS agrees with St. Vincent and the Grenadines, which submitted this document, that the FAO Expert Panel process for evaluation of proposals to amend the Appendices for commercially exploited aquatic species is a costly and complicated procedure. In many cases, the analyses of proposals by the FAO Panel of Experts have been useful and informative. However, we disagree with this document that the advice from the FAO Panel of Experts was ignored or disregarded by Parties. We are certain that Parties, in deciding their views on amendments to the Appendices, fully took note of the analyses of FAO, the CITES Secretariat, NGOs, and other experts. WCS sees no need for the Standing Committee to commence the process proposed in this document. The FAO Expert Panel process is an independent one, convened by FAO and not CITES, and it is up to FAO as to whether or not they wish to continue it. We also urge the Standing Committee not to adopt the recommendation in the document to request the CITES Secretariat to undertake an evaluation of the conservation effectiveness of the inclusion of marine fish species in the CITES Appendices (at CoP16 and CoP17). That would be exceedingly complicated and expensive. WCS agrees that much more needs to be done to help Parties implement the listing of marine fish species on the CITES Appendices (as well as all species), including through the provision of training, capacity building, and resources; however, many Parties have made significant positive advances in their implementation and enforcement of the Convention for marine fish species. We recommend that if external funding is available, it would be better focused on assisting Parties with enforcement and implementation of the Convention.

72. Analysis of the Relevance of the Criteria of Resolution 9.24 (Rev. CoP17) [[Document 72](#)]

WCS does not agree with the claim in this document, submitted by St. Vincent and the Grenadines, that the current criteria to amend the Appendices (Reso. Conf. 9.24 (Rev. CoP17)) create an ambiguous and confusing situation, or somehow are of limited relevance for marine species. We believe that the criteria have served the Parties exceedingly well since they were adopted at CoP9 in 1994 (with subsequent amendments). We see no reason to instruct the Secretariat to produce an analysis of all proposals to amend the Appendices for marine species; we prefer that the Secretariat's limited resources be focused on implementation and enforcement of the Convention. We recommend that the Standing Committee reject the recommendations in this document.

